

Michael R McLane  
[mmclane@lynchmurphy.com](mailto:mmclane@lynchmurphy.com)  
Lynch Murphy McLane LLP  
1000 SW Disk Dr  
Bend, OR 97702  
Telephone: (541) 383-5857

Matthew A Wand  
[matt@wandlegal.com](mailto:matt@wandlegal.com)  
Wand Legal LLC  
1000 SW Disk Dr  
Bend, OR 97702  
Telephone: (503) 680-8180

*Attorneys for Amicus*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

OREGON FIREARMS FEDERATION, INC.,  
et al.,

Plaintiffs,

v.

KATE BROWN, et al.,

Defendants.

Case No. 2:22-cv-01815-IM (*Lead Case*)  
Case No. 3:22-cv-01859-IM (*Trailing Case*)  
Case No. 3:22-cv-01862-IM (*Trailing Case*)  
Case No. 3:22-cv-01869-IM (*Trailing Case*)

CONSOLIDATED CASES

**DECLARATION OF SHEENA  
WILLIAMS IN SUPPORT OF AMICUS  
CURIAE NATIONAL AFRICAN  
AMERICAN GUN ASSOCIATION, INC.,  
ASIAN PACIFIC AMERICAN GUN  
OWNERS ASSOCIATION, DC PROJECT  
FOUNDATION, INC., AND OPERATION  
BLAZING SWORD, INC.-PINK PISTOLS  
IN SUPPORT OF EYRE PLAINTIFFS'  
PRELIMINARY INJUNCTION**

*(caption continued on next page)*

MARK FITZ, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

KATERINA B. EYRE, TIM FREEMAN,  
MAZAMA SPORTING GOODS, NATIONAL  
SHOOTING SPORTS FOUNDATION, and  
OREGON STATE SHOOTING  
ASSOCIATION,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, Attorney General of  
Oregon, and TERRI DAVIE, Superintendent of  
the Oregon State Police,

Defendants.

DANIEL AZZOPARDI, et al.,

Plaintiffs,

v.

ELLEN F. ROSENBLUM, et al.,

Defendants.

I, Sheena Williams, hereby declare as follows:

1. I am over the age of 18 years, and I am qualified to submit this Declaration on behalf of Amicus Curiae. I make this Declaration based on my personal knowledge.

2. I am the owner of Krav Maga Salem, a business in Salem, Oregon, that teaches self-defense to men and women.

3. I have the distinct and unique background of teaching self - defense since 2009 and firearms since 2013, not exclusively but often to women as well as having a private security background where my role had a distinct emphasis on Domestic Violence and Sexual Assault cases. These cases were often handled by law enforcement and dedicated sex crime nurses and emergency room staff.

4. This firsthand knowledge and experience compel me to share what I believe to be true, that measure 114 will cause irreputable harm far greater than what it's supporters — no matter how well intended — could have known.

5. Please allow my statement to shine some light on the topic of violence against women in Oregon utilizing limited emotion, but simply statistics and data.

6. In 2021 in Oregon there were 18,256 reported incidents of Domestic Violence. In the same year 1,608 restraining orders were issued. For those who may not know, a restraining order is only issued when there is a clear threat of violence against the person petitioning the court. In the same year, 2021, 881 arrests were made for violation of a restraining order.

7. Though there is not consistent information, my experience has been that a woman who has gotten a restraining order finds themselves in a high risk of violence in the 48-hour window following when the order is served to the individual. Some research shows they are at risk of violence for 3 months.

8. In Multnomah County, my contacts inform me that they attempt to serve an issued restraining order within 72 hours of issuance. I have seen it take as short as 24 hours in Marion County.

9. Recognizing the high rate of restraining order violations which are only issued because of an increased risk of violence, paired with the rapid serving of restraining orders, consider now the added burden we place on victims of domestic abuse. Even if there was a class in place for victims to take daily to obtain a firearm, the clock is ticking away. For many victims, the only way to protect themselves from violent retaliation for obtaining a restraining order is to purchase a firearm. Measure 114 leaves those victims vulnerable and subject to violent attacks.

10. A restraining order does not protect anyone; it only enforces consequences for when it is violated, which we see happens nearly 50% of the time. Add to that the restraining order process has been significantly slowed down due to a loss of funding. As if there were not enough hurdles placed in front of a domestic violence survivor but now add in with Measure 114 is the additional cost of a class on top of the firearm, training, child care during training, ammunition, as well as safes or gun locks, and it becomes clear to see that single mothers, people who live at or below the poverty line, and other minority groups will not be able to afford to protect themselves.

11. Having taught hand to hand combat to a wide variety of people ranging from military personal, law enforcement and of course civilians I must point out that there is a reason defensive tactics are not taught in one short class and why sport fighting institutes strict rules and weight classes. Learning effective hand to hand combat skills for self-defense is an investment and takes time, practice, and natural athletic ability.

12. Having taught thousands of average, every day, civilian women I can tell you that size and strength absolutely play a huge role in the attacker's favor. Granted, I teach my students that size and strength are not the only things that matter, but they do matter!

13. Women in Oregon need a fast and efficient way to combat those who would choose to attack them, 74% of which are men who genetically are disposed to being strong, heavier, and more violent.

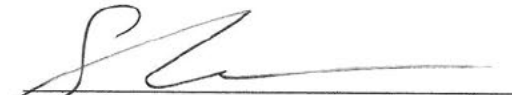
14. In situations where time is limited, obtaining a firearm, especially coupled with the right training has the potential to save a woman further harm.

15. As it is written Measure 114 will cause irreputable harm specifically to women who already make up 46.76% of people who crime is directed towards.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on January 10, 2023

By:

  
Name: Sheena Williams

### CERTIFICATE OF SERVICE

In accordance with Fed. R. Civ. P. 5(b)(2)(E) and LR5-1, I hereby certify that on January 11, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

DATED this 13th day of January 2023.

LYNCH MURPHY MCLANE LLP

/s/ Michael R. McLane

Michael R McLane, OSB No. 904435

1000 SW Disk Dr

Bend, OR 97702

(541) 383-5857

[mmclane@lynchmurphy.com](mailto:mmclane@lynchmurphy.com)

WAND LEGAL LLC

/s/ Matthew A. Wand

Matthew A Wand, OSB No. 004189

1000 SW Disk Dr

Bend, OR 97702

(541) 383-5857

[matt@wandlegal.com](mailto:matt@wandlegal.com)

*Attorneys for Amicus*